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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAURA LEIGH, individually, and WILD
HORSE EDUCATION, a non-profit
corporation,

Plaintiffs,

v.

INTERIOR BOARD OF LAND APPEALS,
UNITED STATES DEPARTMENT OF
INTERIOR, BUREAU OF LAND
MANAGEMENT, and KG MINING INC.,

Defendants.

Case No. 3:25-cv-00039-ART-CSD

**DECLARATION OF JENNIFER RAE
LOVKO IN SUPPORT OF PLAINTIFFS'
REPLY TO DEFENDANTS' RESPONSE
TO PLAINTIFFS' MOTION FOR
JUDICIAL NOTICE**

1 I, JENNIFER RAE LOVKO, declare that if called as a witness in this action I would
2 competently testify of my own personal knowledge, as follows:

3 1. I am an attorney with Greenfire Law, PC, counsel for Plaintiffs in the above-titled
4 action.

5 2. Attached hereto as **Exhibit A** is a true and correct copy of a redlined version of a
6 proposed scheduling order, which shows Plaintiffs' redlines to proposed language for this order.
7 Plaintiffs always remove deadlines related to judicially noticed documents because not all
8 appropriate extra-record documents can be known at such an early date prior to briefing.

9 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
10 United States of America that the foregoing is true and correct.

11 Dated this 19th day of September 2025,

12 /s/ Jennifer Rae Lovko
13 Jennifer Rae Lovko
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